

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
TYRONE CLARK	:	VIOLATIONS:
WAYNE HOLLAND	:	18 U.S.C. § 1951 (conspiracy to interfere
	:	with interstate commerce by robbery - 1
	:	count)
	:	18 U.S.C. § 1951 (interference with
	:	interstate commerce by robbery - 1
	:	count)
	:	18 U.S.C. § 924(c)(1) (using and carrying
	:	a firearm during and in relation to crime
	:	of violence - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times relevant to this indictment, the Radio Shack store located at 1713 Grant Avenue, in Philadelphia, Pennsylvania, was engaged in selling merchandise, and did business in interstate commerce.

THE ROBBERY CONSPIRACY

2. On or about July 9, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

TYRONE CLARK and
WAYNE HOLLAND

conspired and agreed together, and with others unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay and affect commerce, and the movement of articles

and commodities in commerce, in that defendants CLARK and HOLLAND conspired to unlawfully take and obtain money and other things of value from the persons and the presence of employees of the Radio Shack, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their possession, in violation of Title 18, United States Code, Section 1951(a).

MANNER AND MEANS

It was part of this conspiracy that:

3. Defendants TYRONE CLARK and WAYNE HOLLAND planned and executed the robbery of the Radio Shack and of its employees to obtain money and other things of value.

4. Defendant TYRONE CLARK was armed with a firearm during the robbery and brandished the firearm to obtain money and property in the possession of employees of the Radio Shack.

OVERT ACTS

In furtherance of this conspiracy, in Philadelphia, defendants TYRONE CLARK and WAYNE HOLLAND committed the following overt acts the Eastern District of Pennsylvania,:

On or about July 9, 2006:

1. Defendant TYRONE CLARK armed himself with a handgun in preparation for robbing the Radio Shack.

2. At approximately 3:00 p.m., defendants TYRONE CLARK and WAYNE HOLLAND entered the Radio Shack store pretending to be a customers interested in buying merchandise.

3. Defendant TYRONE CLARK pointed a handgun at the employees of the Radio Shack.

4. At gunpoint, defendants TYRONE CLARK and WAYNE HOLLAND forced the Radio Shack employees to lie down on the floor.

5. Defendants TYRONE CLARK and WAYNE HOLLAND demanded from the employees the keys to the cage in the store where some merchandise was locked up and demanded instructions on how to open the store's cash register.

6. Defendants WAYNE HOLLAND and TYRONE CLARK used tape which they brought to the store to bind the Radio Shack employees' feet, wrists, and mouths.

7. Defendant TYRONE CLARK racked his gun several times during the robbery.

8. Defendants TYRONE CLARK and WAYNE HOLLAND filled bags with Radio Shack property and merchandise before fleeing the store with the stolen property.

All in violation of Title 18, United States Code, Section 1951(a), (b)(1) and (b)(3).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, the Radio Shack store located at 1713 Grant Avenue, in Philadelphia, Pennsylvania, was engaged in selling merchandise, and did business in interstate commerce.

2. On or about July 9, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

TYRONE CLARK and WAYNE HOLLAND

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants CLARK and HOLLAND unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, cellular phones and other merchandise, with the approximate retail value of \$6,000, and United States currency, in the approximate amount of \$600, belonging to the Radio Shack, from the person or in the presence of Radio Shack employees, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by pointing a firearm at the employees, demanding money, and by tying up the employees.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

On or about July 9, 2006, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**TYRONE CLARK and
WAYNE HOLLAND**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a semi-automatic handgun, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Section 1951(a).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney